

TRIGGERS FOCUS GROUP
FOLLOW-UP MONITORING FOR ANALYTICAL CHEMISTRY AND
BACTERIOLOGICAL EXCEEDANCES
5 April 2006

OBJECTIVE OF FOLLOW UP SAMPLING FOR ANALYTICAL CHEMISTRY AND BACTERIOLOGICAL EXCEEDANCES: The objective of this requirement is to obtain information regarding the source, frequency, and magnitude of the water quality exceedance.

PROBLEM STATEMENT: The Compliance Monitoring section of the draft Coalition Group MRP requires re-sampling at a monitoring site whenever a sample exceeds a receiving water limitation or water quality objective. Specifically, the draft MRP indicates that “the Coalition shall re-sample the monitoring site(s) where the exceedance was reported for each constituent that exceeds a receiving water limitation or water quality objective and at two or more sites upstream of the monitoring site with the exceedance (a total of three or more samples) within 72 hours of the submittal of the Exceedance Report....The Coalition Group will continue this re-sampling strategy for each detection that is an exceedance in the re-sampling results, until re-sampling results are below the receiving water limitation that implements the appropriate Basin Plan’s water quality objective.”

This requirement will be impossible to achieve for a given storm event and difficult to achieve for irrigation season monitoring, given that the standard turn around time (TAT) for the receipt of *analytical chemistry and bacteriological data* is typically 30 days; it is not unusual to have a TAT that goes beyond 30 days. Therefore, before the data can be received by the Coalition, the storm event will have ended. Similarly within irrigation season, the irrigation season sampling event may have already occurred before the data from the previous event is received by the Coalition. Under this circumstance, the next routine monitoring event following the observation of a water quality exceedance would in essence qualify as the re-sampling of the original site where the exceedances occurred. Any additional upstream monitoring would be difficult to plan for, as there would be insufficient time to prepare monitoring crews and notify laboratories of the additional work.

Furthermore, re-sampling to identify the source of the exceedance some 30-40 days after the sample was collected that originally triggered the exceedance is likely to result in data that cannot be linked to the original exceedance (e.g., upstream identification of the “source” of the exceedance) due to the TAT and the time that would have passed between the original sample collection and the reporting of the exceedance.

Therefore, the Triggers Focus Group is making the following recommendation to the TIC:

RECOMMENDATION:

When an exceedance of a receiving water limitation or water quality objective is reported for an *analytical chemistry or bacteriological result*, the Coalition must have a pre-determined follow-up plan in their Monitoring and Reporting Program Plan. This approach will provide flexibility for Coalitions to design site- (or watershed) specific,

science-based approaches to address this requirement. It is expected that the proposed approach will be based on historical monitoring data and current pesticide use data. Follow-up monitoring approaches may include, but may not be limited to, monitoring at two upstream sites, re-sampling of the site with the water quality exceedance, use of historical data to design a re-sampling strategy, dialogue and data from the County Agriculture Commissioner, and re-sampling at the time of re-sampling for toxicity testing (i.e., if toxicity testing indicates that a specific class of contaminants may be involved with the toxicity).

It is recommended that the narrative in the draft Coalition Group MRP be changed to read: “the Coalition shall include a follow-up monitoring approach to address exceedances of receiving water limitation or water quality objectives for *analytical chemistry or bacteriological data* in their MRP Plan and shall implement the approach via the methods and within the timeline outlined in the individual Coalition MRP Plan approved by the Executive Officer of the Central Valley Water Board. The Coalition will continue implementing their follow-up monitoring approach until a source or sources of the water quality exceedance is identified via the methods and frequency proposed in the Coalition MRP.”